

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

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INRE : THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO as representative of THE COMMONWEALTH OF PUERTO RICO, et als Debtors	PROMESA Title III CASE NO. 17-BK-3283-LTS (Jointly Administered) This filing relates to claim 10282
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OBJECTION TO NOTICE OF THE FORTY-EIGHTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO SUBSEQUENTLY AMENDED CLAIMS

COMES NOW, Leida Pagán Torres in representation of DAMEXCO, Inc and Luc Brunelle as a Creditor of the above Debtor, hereby moves respectfully by and through undersigned representation which informs and request:

1. On May 2, 2018, the party here appearing through the undersigned submitted a document entitled Proof of Claim, which was entered as claim 10282.
2. On June 6, 2019, the Commonwealth of Puerto Rico (the "Commonwealth", by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board", as representative of the Commonwealth pursuant to Section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act ("PROMESA"), filed the Forty-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended Claims (the "Omnibus Objection").
3. On page 59, subsection 295, of the Omnibus Objection, it is indicated that on May 29, 2018 claim 33003 was filed, and that the reason for being disallowed is because it is

Amended and superseded by a later filed Proof of Claim.

It should be noted that the undersigned have and was never notified of claim 33003.

4. We proceeded to verify claim 33003 and it appears that the Proof of Claim 33003 does not alter or change the main information for which the 10282 claim was filed, nor does it amend the amount claimed or even add additional documents. Claim 10282 consists of 56 pages and claim 33003 consists of 65, this is due to the fact that in claim 10282 the annexes were detailed in one page and in claim 33003 each annex has a separate page indicating the number of annexes that follows them. No additional documentation was included.

The only change notice is on page 2 subsection 3, that changes the name and address of where the creditor's documentation should be notified as well as where payments shall be notify, in no other matter there is any amendment that supersedes claim 10282.

5. In compliance with Local Rule 3007-1, the undersigned objects claim 33003 as for to amend claim 10282, because the alleged amendment that is intended to be made is solely and exclusively to stop notifying the legal representative of the creditor and does not obey that the information provided in the Proof of Claim changes substantially or that additional documentation is included that changes the amount in question as the data provided.

6. Access to amend claim 10282 for the only purpose of notification matters could be detrimental to the rights of the here creditor, since the undersigned attorney is the one who has all the information and documentation on the case that is detailed in claim 10282¹ as for any other that can be requested. The lack of Notification to this attorney may lead to the creditor to not exercise his rights validly.

WHEREFORE, the Creditor respectfully request to this Honorable Court to revoke claim 33003 and keep claim 10282 current.

¹ The undersigned representation is the attorney at law of the creditor since approximately 2006.

I HEREBY CERTIFY that I sent copy of this document to by certified mail to: Counsel for the Oversight Board Proskauer Rose LLP, Eleven Times Square, New York, New York 10036-8299 (Att. Martin J. Bienenstock, Brian S. Rosen), Counsel for the Creditors' Committee Paul Hastings LLP, 200 Park Avenue, New York, New York 10166 (Att. Luc A. Despins, James Bliss, James Worthington, G. Alexander Bongartz).

In Mayagüez, Puerto Rico, dated June 25, 2019.



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In behalf of Creditor
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